

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In re:

Jointly Administered

EPIC Companies Midwest, LLC,
EPIC Companies Midwest 2023, LLC,
EPIC Employee, LLC,
EOLA Capital, LLC, and
EC West Fargo, LLC,

Bankruptcy No. 24-30281
Bankruptcy No. 24-30282
Bankruptcy No. 24-30283
Bankruptcy No. 24-30284
Bankruptcy No. 24-30285

Debtors.¹

Chapter 11

**SIXTH APPLICATION OF FREDRIKSON & BYRON, P.A. FOR ALLOWANCE OF
FEES AND EXPENSES AS CHAPTER 11 COUNSEL FOR THE DEBTORS FROM
JANUARY 1, 2025 THROUGH JANUARY 31, 2025**

1. Steven R. Kinsella and Fredrikson & Byron, P.A. (collectively, “Fredrikson”) make this Application for allowance of fees for professional services rendered and for reimbursement of expenses incurred as Chapter 11 counsel for EPIC Companies Midwest, LLC, EPIC Companies Midwest 2023, LLC, EPIC Employee, LLC, EOLA Capital, LLC, and EC West Fargo, LLC (collectively, the “Debtors”) between January 1, 2025 and January 31, 2025 pursuant to 11 U.S.C. § 330.

2. In support of this Application, Fredrikson respectfully states as follows:

JURISDICTION

3. This Court has jurisdiction over this Application pursuant to 28 U.S.C. §§ 157 and 1334 and Fed. R. Bankr. P. 5005. This a core proceeding pursuant to 28 U.S.C. § 157(b). Venue

¹ In accordance with Fed. R. Bankr. P. 2002(n) and 1005 and 11 U.S.C. § 342(c), as applicable, the Debtors’ address is 400 10th Street SE, Minot, ND 58701 and their Employer Identification Numbers (EINs) are as follows: 83-2840705 (EPIC Companies Midwest, LLC), 88-3709518 (EPIC Companies Midwest 2023, LLC), 88-4112082 (EPIC Employee, LLC), 88-0554720 (EOLA Capital, LLC) and 82-5331354 (EC West Fargo, LLC).

is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. The petitions commencing these Chapter 11 cases were filed on July 8, 2024 (the “Petition Date”). The cases are currently pending before this Court.

4. This Application arises under 11 U.S.C. §§ 503(b)(2), 328(a), 330, and 331. This Application is filed under Fed. R. Bankr. P. 2016 and 2002(a)(6). Notice of this Application is provided pursuant to the Notice and Service Requirements adopted pursuant to Local Rule 2002-1 and the Court’s order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). (ECF No. 124.)

BACKGROUND

5. On the Petition Date, the Debtors filed an application to employ Fredrikson as Chapter 11 counsel for the Debtors effective July 8, 2024. (ECF No. 13.) The Court approved the application to employ Fredrikson on July 25, 2024. (ECF No. 49.) A copy of that order is attached as **Exhibit A**.

6. On the Petition Date, the Debtors also filed a motion for an order establishing interim compensation procedures. (ECF No. 11.) The Court entered an order on August 14, 2024 granting the motion and allowing Fredrikson to file monthly applications for compensation. (ECF No. 72.) A copy of that order is attached as **Exhibit B**.

7. This is Fredrikson’s sixth application for allowance of fees and expenses under 11 U.S.C. § 331. Fredrikson received court approval for the following prior fee applications:

<u>Fee Application Amount</u>	<u>Date of Order Approving Fee Application</u>	<u>Docket No.</u>
\$80,535.96	10/21/2024	148
\$20,172.00	11/14/2024	164
\$37,675.00	12/13/2024	182
\$42,291.00	1/15/2024	206
\$36,048.00	2/12/2025	221
\$216,721.96		

8. Fredrikson believes that the Debtors are current in payment of ordinary operating expenses and any allowed administrative expenses, that any quarterly fees have been or will be paid as required to the United States Trustee, and that all monthly operating reports are being timely filed, including pursuant to any extensions granted by the United States Trustee.

RELIEF REQUESTED

9. **Post-Petition Fees.** By this Application, Fredrikson requests allowance of fees for professional services rendered during these Chapter 11 cases between January 1, 2025 and January 31, 2025 in the amount of **\$45,008.00**, and reimbursement of expenses in the amount of **\$94.50**, for a total of **\$45,102.50**.

10. The professional services rendered by Fredrikson are detailed on the attached **Exhibit C**. Those services include the tasks specifically described below:

(5001) Asset Analysis and Recovery: \$19,819.50

Services include meeting with the Chief Restructuring Officer (“CRO”) to conduct asset analyses; communicating with counsel for borrowers; participate in ongoing settlement discussions and preparing settlement proposals; meeting with potential mediator; and drafting complaint against borrowers.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	26.4	2025	\$635	\$16,764.00
Katherine A. Nixon	6.3	2025	\$485	\$3,055.50
TOTAL	32.7			\$19,819.50

Blended Hourly Rate:	\$606.10
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(5002) Asset Disposition: \$582.00

Services include drafting and finalizing notices of settlement with certain borrowers.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	1.2	2025	\$485	\$582.00
TOTAL	1.2			\$582.00

Blended Hourly Rate:	\$485.00
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(5007) Claims Administration and Objections: \$190.50

Services include communicating with claimants regarding claims buyer.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.3	2025	\$635	\$190.50
TOTAL	0.3			\$190.50

Blended Hourly Rate:	\$635.00
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(5010) Employment and Fee Applications: \$2,698.00

Services include drafting, revising, and finalizing Fredrikson's fifth fee application; assisting in preparing and finalizing the CRO's fifth staffing report; communicating with conflicts counsel; preparing and finalizing an application to employ conflicts counsel; and notifying CRO regarding granted applications.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	1.9	2025	\$635	\$1,206.50
Katherine A. Nixon	2.3	2025	\$485	\$1,115.50
Shataia Stallings	1.6	2025	\$235	\$376.00
TOTAL	5.8			\$2,698.00

Blended Hourly Rate:	\$465.17
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(5013) Meetings and Communications with Creditors: \$5,724.50

Services include communicating with various creditors and counsel for the official committee of unsecured creditors (the "Committee") and meeting with the Committee.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	6.8	2025	\$635	\$4,318.00
Katherine A. Nixon	2.9	2025	\$485	\$1,406.50
TOTAL	9.7			\$5,724.50

Blended Hourly Rate:	\$590.15
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(5015) Plan and Disclosure Statement: \$6,666.50

Services include drafting plan of liquidation and motion for substantive consolidation.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	9.2	2025	\$635	\$5,842.00
Katherine A. Nixon	1.7	2025	\$485	\$824.50
TOTAL	10.9			\$6,666.50

Blended Hourly Rate:	\$611.61
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(5018) Reporting: \$358.50

Services include emailing the CRO regarding monthly operating reports; assisting the CRO in finalizing monthly operating reports; and emailing counsel for the United States Trustee regarding bank records.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	0.4	2025	\$485	\$194.00
Shataia Stallings	0.7	2025	\$235	\$164.50
TOTAL	1.1			\$358.50

Blended Hourly Rate:	\$325.91
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(0003) Adversary Proceeding Against Preference 42, LLC: \$194.00

Services include attending scheduling conference; drafting statement regarding jury trial demand; and reviewing scheduling order.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	0.4	2025	\$485	\$194.00
TOTAL	0.4			\$194.00

Blended Hourly Rate:	\$485.00
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(0004) Adversary Proceeding Against Boulevard Square II, LLC et al.: \$2,842.00

Services include analyzing settlement proposal; drafting letters and affidavits to state court clerk regarding foreign judgments; communicating regarding collection; researching jury trial issue; and drafting statement regarding jury trial demand.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.3	2025	\$635	\$190.50
Katherine A. Nixon	2.3	2025	\$485	\$1,115.50
Abigale R. Griffin	4.8	2025	\$320	\$1,536.00
TOTAL	7.4			\$2,842.00

Blended Hourly Rate:	\$384.05
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(0005) Adversary Proceeding Against Pioneer Place, LLC: \$1,056.50

Services include drafting letters and affidavits to state court clerk regarding foreign judgments and communicating regarding collection.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.1	2025	\$635	\$63.50
Katherine A. Nixon	0.2	2025	\$485	\$97.00
Abigale R. Griffin	2.8	2025	\$320	\$896.00
TOTAL	3.1			\$1,056.50

Blended Hourly Rate:	\$340.81
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(0006) Adversary Proceeding Against SAD Downtown, LLC: \$257.50

Services include attending scheduling conference and drafting statement regarding jury trial demand.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.1	2025	\$635	\$63.50
Katherine A. Nixon	0.4	2025	\$485	\$194.00
TOTAL	0.5			\$257.50

Blended Hourly Rate:	\$515.00
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(0007) Adversary Proceeding Against Greenfield Commons, LLC et al.: \$1,333.50

Services include reviewing and analyzing settlement proposal and preparing counteroffers.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	2.1	2025	\$635	\$1,333.50
TOTAL	2.1			\$1,333.50

Blended Hourly Rate:	\$635.00
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(0008) Adversary Proceeding Against EPIC Holdings II, LLC: \$97.00

Services include reviewing filed answer and scheduling order and emailing the CRO regarding the same.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	0.2	2025	\$485	\$97.00
TOTAL	0.2			\$97.00

Blended Hourly Rate:	\$485.00
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(0009) Adversary Proceeding Against U of J MU Jamestown, LLC: \$959.50

Services include drafting and revising settlement agreement and coordinating execution.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.9	2025	\$635	\$571.50
Katherine A. Nixon	0.8	2025	\$485	\$388.00
TOTAL	1.7			\$959.50

Blended Hourly Rate:	\$564.41
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(0010) Adversary Proceeding Against LTC-The Don, LLC: \$160.50

Services include reviewing filed answer and drafting statement regarding jury trial demand.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.1	2025	\$635	\$63.50
Katherine A. Nixon	0.2	2025	\$485	\$97.00
TOTAL	0.3			\$160.50

Blended Hourly Rate:	\$535.00
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(0011) Adversary Proceeding Against 36th and Veterans, LLC: \$929.50

Services include drafting and finalizing motion for default judgment and communicating with counsel for the defendant.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.7	2025	\$635	\$444.50
Katherine A. Nixon	1.0	2025	\$485	\$485.00
TOTAL	1.7			\$929.50

Blended Hourly Rate:	\$546.76
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(0013) Adversary Proceeding Against Pioneer Place Holdings, LLC: \$515.00

Services include drafting motion for default judgment and analyzing settlement proposal.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.2	2025	\$635	\$127.00
Katherine A. Nixon	0.8	2025	\$485	\$388.00
TOTAL	1			\$515.00

Blended Hourly Rate:	\$515.00
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(0016) Adversary Proceeding Against HI West Acres, LLC f/k/a EPIC Hospitality, LLC: \$242.50

Services include communicating with counsel for the defendant; reviewing scheduling order; and drafting statement regarding jury trial demand.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Katherine A. Nixon	0.5	2025	\$485	\$242.50
TOTAL	0.5			\$242.50

Blended Hourly Rate:	\$485.00
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(0017) Adversary Proceeding Against LTC – The Falcon, LLC: \$381.00

Services include revising settlement agreement with borrower.

<u>Name</u>	<u>Hours</u>	<u>Year</u>	<u>Hourly Rate</u>	<u>Fees</u>
Steven R. Kinsella	0.6	2025	\$635	\$381.00
TOTAL	0.6			\$381.00

Blended Hourly Rate:	\$635.00
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TOTAL POST-PETITION FEES: \$45,008.00

11. **Reimbursement of Expenses.** In the course of this representation, Fredrikson has also incurred expenses detailed as part of Matter Nos. 5000, 0004, and 0005 on **Exhibit C**, and requests allowance thereof as follows:

<u>Expenses</u>	<u>Amount</u>
Certified Copies of Judgments	\$64.50
Foreign Judgment Fees	\$30.00
TOTAL	\$94.50

TOTAL EXPENSES: \$94.50

12. All services for which fees are requested by Fredrikson were performed for and on behalf of the Debtors, and not on behalf of any committee, creditor, or other person.

13. The amount requested constitutes reasonable compensation for actual, necessary services rendered by Fredrikson, based on the nature, the extent, and the value of such services, the time spent on such services, and the cost of comparable services other than in a case under Title 11. Fredrikson has not entered into any agreement, express or implied, with any other party-in-interest, including the Debtors, any creditor, receiver, trustee, or any representative of any of them, or with any attorney for such party-in-interest in the proceedings, for the purpose of fixing fees or other compensation to be paid to such party-in-interest in the proceedings for services

rendered or expenses incurred from the assets of the estate in excess of the compensation allowed by law.

WHEREFORE, Fredrikson respectfully requests that the Court enter an order:

A. Allowing Fredrikson's fees incurred between January 1, 2025 and January 31, 2025 in the amount of \$45,008.00, and expenses in the amount of \$94.50, totaling \$45,102.50;

B. Authorizing the Debtors to pay Fredrikson such allowed postpetition fees and expenses;

C. Granting administrative expense priority to Fredrikson's allowed fees and expenses; and

D. Granting such other and further relief as may be just and proper.

Dated: February 14, 2025

/e/ Steven R. Kinsella

Michael S. Raum (#05676)

FREDRIKSON & BYRON, P.A.

51 Broadway, Suite 400

Fargo, ND 58102-4991

701.237.8200

mraum@fredlaw.com

Steven R. Kinsella (#09514)

Katherine A. Nixon (*pro hac vice* MN #0402772)

FREDRIKSON & BYRON, P.A.

60 South 6th Street, Suite 1500

Minneapolis, MN 55402-4400

612.492.7000

skinsella@fredlaw.com

knixon@fredlaw.com

ATTORNEYS FOR DEBTORS

AFFIDAVIT

I, Steven R. Kinsella, an attorney at the law firm of Fredrikson & Byron, P.A., declare under penalty of perjury that the foregoing Fifth Application of Fredrikson & Byron, P.A. for Allowance of Fees and Expenses as Chapter 11 Counsel for the Debtors from January 1, 2025 Through January 31, 2025 is true and correct according to the best of my knowledge, information, and belief.

Dated: February 14, 2025

/e/ Steven R. Kinsella
Steven R. Kinsella

EXHIBIT A

CourtAlert® Case Management

From: ecf@ndb.uscourts.gov
Sent: 7/25/2024 12:56:27 PM
To: nate_olson@ndb.uscourts.gov
Subject: Ch-11 24-30281 EPIC Companies Midwest, LLC Order on Application to Employ

CAUTION: EXTERNAL E-MAIL

*****NOTE TO PUBLIC ACCESS USERS***** Judicial Conference of the United States policy permits attorneys of record and parties in a case (including pro se litigants) to receive one free electronic copy of all documents filed electronically, if receipt is required by law or directed by the filer. PACER access fees apply to all other users. To avoid later charges, download a copy of each document during this first viewing. However, if the referenced document is a transcript, the free copy and 30-page limit do not apply.

U.S. Bankruptcy Court

District of North Dakota

Notice of Electronic Filing

The following transaction was received from vck, Court entered on 7/25/2024 at 12:56 PM CDT and filed on 7/25/2024

Case Name: EPIC Companies Midwest, LLC

Case Number: [24-30281](#)

Document Number: [49](#)

Docket Text:

Order Approving Application to Employ Steven R. Kinsella and Fredrikson & Byron, P.A. as counsel for Debtor EPIC Companies Midwest, LLC effective July 8, 2024 (Related Doc. [13]). The application to employ is APPROVED subject to the limitations on compensation provided by 11 U.S.C. § 328. This order is not a determination that the services or rates charged are necessary and reasonable. The person or entity employed under this order shall file a fee application in accordance with the Bankruptcy Code and Federal Rules of Bankruptcy Procedures. See Fed. R. Bank. P. 2016, 2017 and 11 U.S.C. 329, 330. Applicant must also comply with Local Rules. As required by applicable federal rule or statute, the Movant shall serve this docket text only order on all appropriate parties that will not receive notice of electronic filing. By Judge Shon Hastings (Text order only). Signed on 7/25/2024 (vck)

The following document(s) are associated with this transaction:

24-30281 Notice will be electronically mailed to:

Douglas Christensen on behalf of Creditor Beth Holmes
dougc@grandforkslaw.com,
sarah@grandforkslaw.com;jen@grandforkslaw.com;julie@grandforkslaw.com

Michael Gust on behalf of Interested Party Bank Forward
mlgfilings@andersonbottrell.com, jernst@abstlaw.net

Joseph D Hackman on behalf of Interested Party Bank Forward
jhackman@abstlaw.net

Peter B. Hankla on behalf of Interested Party Randy and Dorothy Henke
phankla@mcgeelaw.com

Steven R Kinsella on behalf of Debtor EC West Fargo, LLC
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EOLA Capital, LLC
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EPIC Companies Midwest 2023, LLC
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EPIC Companies Midwest, LLC
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Steven R Kinsella on behalf of Debtor EPIC Employee, LLC
skinsella@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

John M Krings, Jr. on behalf of Creditor Cornerstone Bank
john@kaler-doeling.com, janae@kaler-doeling.com

Katherine A. Nixon on behalf of Debtor EPIC Companies Midwest, LLC
knixon@fredlaw.com, sstallings@fredlaw.com;autodockets@fredlaw.com

Richard P. Olson on behalf of Creditor Essential Living Inc
rpolsonecf@minotlaw.com, rpolson@minotlaw.com

Richard P. Olson on behalf of Creditor Bruce & Diane Walker
rpolsonecf@minotlaw.com, rpolson@minotlaw.com

Robert B. Raschke
USTPRegion12.SX.ECF@usdoj.gov

Michael S Raum on behalf of Debtor EPIC Companies Midwest, LLC
mraum@fredlaw.com, mraum@fredlaw.com;dtaylor@fredlaw.com

Katrina A. Turman Lang on behalf of Creditor Dietz Properties, LLC
klang@woldlaw.com, melanie@turmanlaw.com

Katrina A. Turman Lang on behalf of Creditor Candice Dietz
klang@woldlaw.com, melanie@turmanlaw.com

Katrina A. Turman Lang on behalf of Creditor Larry Dietz
klang@woldlaw.com, melanie@turmanlaw.com

Sarah J. Wencil on behalf of U.S. Trustee Robert B. Raschke
sarah.j.wencil@usdoj.gov

Benjamin Williams on behalf of Creditor Cullen Insulation, Inc.
ben@kennellybusinesslaw.com, beth@kennellybusinesslaw.com

Benjamin Williams on behalf of Creditor Daniel Frisch
ben@kennellybusinesslaw.com, beth@kennellybusinesslaw.com

24-30281 Notice will not be electronically mailed to:

EXHIBIT B

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In re:

Jointly Administered

EPIC Companies Midwest, LLC,
EPIC Companies Midwest 2023, LLC,
EPIC Employee, LLC,
EOLA Capital, LLC, and
EC West Fargo, LLC,

Bankruptcy No. 24-30281
Bankruptcy No. 24-30282
Bankruptcy No. 24-30283
Bankruptcy No. 24-30284
Bankruptcy No. 24-30285

Debtors.

Chapter 11

**ORDER ESTABLISHING PROCEDURES FOR INTERIM COMPENSATION AND
REIMBURSEMENT OF EXPENSES FOR RETAINED PROFESSIONALS**

Debtors filed a Motion for an Order (I) Establishing Procedures for Interim Compensation and Reimbursement of Expenses for Retained Professionals and (II) Granting Related Relief. Doc. 11. Pursuant to the notice of the Motion [Doc. 16], objections to the Motion were due by July 30, 2024.

Debtors served notice of the Motion. The Court received no objections to the Motion. The Court held a hearing on the Motion on August 14, 2024. Based upon the Motion and the Declaration of Patrick Finn [Doc. 6] and for the reasons stated on the record at the August 14, 2024, hearing, the Court finds that the circumstances of these cases warrant granting the relief provided below.

IT IS ORDERED that, except as otherwise provided in any order of the Court, professionals employed in this bankruptcy case, including Fredrikson & Byron, P.A., shall be permitted to seek interim payment of compensation and reimbursement of expenses by filing monthly applications for interim compensation and reimbursement of expenses.

IT IS FURTHER ORDERED that Debtors are authorized to pay all reasonable amounts invoiced by Lighthouse Management Group, Inc. (“Lighthouse”) for fees and expenses on a bi-weekly basis.

IT IS FURTHER ORDERED that Lighthouse will file with the Court and serve on Debtors, the United States Trustee, and any statutory committee appointed in this case (the “Notice Parties”) a monthly staffing report, filed and served by the 20th of each month for the previous month, identifying the Lighthouse employees who worked on this case, the total hours billed by Lighthouse, and a summary of the tasks performed. Lighthouse will also file with the Court and serve on the Notice Parties a quarterly compensation report by the 20th of each month following the end of a quarter, showing the total fees and expenses for the preceding quarter. These reports will be deemed applications for interim compensation under sections 328 and 330. Parties in interest may object to the reports within 21 days after notice. The Court will rule on the applications after the deadline to object passes or after a hearing on the application.

IT IS FURTHER ORDERED that Debtors will allocate the fees and expenses approved among Debtors pro rata if the professionals charge for tasks that generally apply to all cases and to the appropriate Debtor if the tasks relate solely to a specific Debtor.

Dated: August 14, 2024.



SHON HASTINGS, JUDGE
UNITED STATES BANKRUPTCY COURT

EXHIBIT C

Fredrikson

Invoice: 1907735
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.5000

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through January 31, 2025

Regarding: Case Administration

Total For Current Costs and Other Charges:	\$ 64.50
Total For Current Invoice:	\$ 64.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:

[Redacted Wire Instructions]

Please send remittance information to paynotification@fredlaw.com

Tax ID: [Redacted]

**** Please note that Fredrikson & Byron will be adjusting its standard hourly billing rate schedule and some service charges rendered after January 1, 2025. If you have questions about the billing rates of specific individuals, please contact your billing attorney.****

Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1907735
Invoice Date: February 5, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
01/06/25	1901810	2,157.50		2,157.50
Total Prior Balance:				\$ 2,157.50

To avoid duplicate payments, the Prior Balance reflects what was still due as of February 5, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1907735
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.5000

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Costs and Other Charges

		<u>Amount</u>
01/07/25	COURTS/USBC/ND-T - Certified Copy of Judgment	12.50
01/13/25	COURTS/USBC/ND-T - Two Certified Copies of Judgment	26.00
01/21/25	COURTS/USBC-ND-T - Two Certified Copies of Judgment	26.00

Current Costs and Other Charges: **\$ 64.50**

Invoice Totals

Total For Current Costs and Other Charges: \$ 64.50

Total For Current Invoice: \$ 64.50

Fredrikson

Invoice: 1907736
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.5001

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through January 31, 2025

Regarding: Asset Analysis and Recovery

Total for Current Legal Fees: \$ 19,819.50

Total For Current Invoice: \$ 19,819.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:

[REDACTED]

Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

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Invoice: 1907736
Invoice Date: February 5, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
01/06/25	1901811	27,792.00		27,792.00
Total Prior Balance:				\$ 27,792.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of February 5, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1907736
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.5001

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/02/25	S. Kinsella	Communications with counsel for project borrower.	0.10	63.50
01/03/25	S. Kinsella	Communications with counsel for project borrowers.	0.20	127.00
01/06/25	K. Nixon	Meeting with CRO regarding asset analysis.	1.10	533.50
01/06/25	S. Kinsella	Meeting with CRO regarding outstanding adversary proceedings and settlement proposals (1.2); multiple communications with counsel for borrowers regarding settlement proposals (.9); communications with conflicts counsel regarding additional adversary proceedings (.4).	2.50	1,587.50
01/07/25	S. Kinsella	Phone call with CRO regarding status of settlement discussions (.6); meeting with counsel for project borrowers (.6); analyze potential mediation options (.4).	1.60	1,016.00
01/08/25	K. Nixon	Review comprehensive list re: status of open adversary proceedings and send copy to CRO.	0.20	97.00
01/08/25	S. Kinsella	Phone call with CRO regarding status of settlement negotiations (1.2); communications with counsel for borrowers regarding settlement proposals (.5); prepare analysis of pending litigation and ongoing settlement discussions (1.8).	3.50	2,222.50
01/09/25	S. Kinsella	Phone call with borrower counsel (.5); phone call with CRO regarding the same (.5); email communications with multiple borrower counsel regarding settlement proposals (.7); analyze mediator options and prepare strategy regarding the same (.8); continue to prepare analysis of current settlement proposals and status of adversary proceedings (.5).	3.00	1,905.00



Invoice:
Invoice Date:
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February 5, 2025
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01/10/25	S. Kinsella	Communications with counsel for project borrower regarding settlement proposal.	0.30	190.50
01/13/25	S. Kinsella	Meeting with CRO (.9); meeting with counsel for project borrower (.9); review settlement proposal (.4); extensive communications with counsel for project borrower (.8); analyze separate settlement proposal and related issues (.7); communications with CRO regarding settlement proposals (.4).	4.10	2,603.50
01/13/25	K. Nixon	Meetings with CRO regarding asset analysis (1.1); phone call with G. Singer re: status and resolution of certain adversary proceedings (0.4); email A. Griffin re: garnishments (0.1).	1.60	776.00
01/14/25	S. Kinsella	Communications with potential conflicts counsel (.1); phone call with CRO regarding settlement proposals (.3); review settlement proposals (.2).	0.60	381.00
01/15/25	S. Kinsella	Meeting with CRO regarding settlement proposals (.5); communications with counsel for project borrowers regarding settlement (.3).	0.80	508.00
01/17/25	S. Kinsella	Communications with potential mediator (.1); communications with project borrower (.2).	0.30	190.50
01/21/25	S. Kinsella	Communications with potential mediator (.5); phone call with CRO regarding settlement proposal (.6).	1.10	698.50
01/22/25	S. Kinsella	Analyze settlement proposal (.2); communications with mediator (.2).	0.40	254.00
01/23/25	K. Nixon	Email CRO re: information requested from certain borrower.	0.10	48.50
01/23/25	S. Kinsella	Meeting with CRO regarding settlement proposals.	0.70	444.50
01/24/25	K. Nixon	Meeting with J. Klein re: mediation.	0.50	242.50
01/24/25	S. Kinsella	Meeting with mediator and follow up communications (.7); communications with counsel for project borrower (.2).	0.90	571.50
01/27/25	S. Kinsella	Meeting with CRO (1.1); prepare analysis of outstanding loans and status of negotiations (.7); communications with counsel for project borrowers (.9).	2.70	1,714.50
01/27/25	K. Nixon	Meeting with CRO regarding asset analysis (1.2); email A. Griffin re: garnishments and domesticating judgments (0.1).	1.30	630.50
01/28/25	S. Kinsella	Phone call with CRO regarding status of negotiations (.6); meeting with counsel for project borrower regarding settlement proposals (.2).	0.80	508.00

Fredrikson

Invoice: 1907736
Invoice Date: February 5, 2025
Page: 3

01/29/25	K. Nixon	Draft complaint against borrower(s).	1.50	727.50
01/29/25	S. Kinsella	Review mediator documents (.3); review settlement proposals (.6).	0.90	571.50
01/30/25	S. Kinsella	Analyze settlement proposals.	0.70	444.50
01/31/25	S. Kinsella	Review settlement proposals (.4); phone call with CRO regarding the same (.8).	1.20	762.00
Current Legal Fees:			32.70	\$ 19,819.50

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	26.40	16,764.00
Katherine Nixon	485.00	6.30	3,055.50
Total		32.70	\$ 19,819.50

Invoice Totals

Total for Current Legal Fees: \$ 19,819.50

Total For Current Invoice: \$ 19,819.50

Fredrikson

Invoice: 1907737
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.5002

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through January 31, 2025

Regarding: Asset Disposition

Total for Current Legal Fees:	\$ 582.00
Total For Current Invoice:	\$ 582.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:

[REDACTED]

Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

**** Please note that Fredrikson & Byron will be adjusting its standard hourly billing rate schedule and some service charges rendered after January 1, 2025. If you have questions about the billing rates of specific individuals, please contact your billing attorney.****

Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1907737
Invoice Date: February 5, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
01/06/25	1901812	504.00		504.00
Total Prior Balance:				\$ 504.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of February 5, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1907737
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.5002

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/07/25	K. Nixon	Draft revised proposed order approving settlement with Friends of the Wave, LLC.	0.20	97.00
01/08/25	K. Nixon	Email regarding Court approval of settlement with Friends of the Wave, LLC.	0.10	48.50
01/17/25	K. Nixon	Email G. Singer re: mediation.	0.10	48.50
01/21/25	K. Nixon	Draft motion to approve settlement with LTC - The Falcon, LLC.	0.50	242.50
01/22/25	K. Nixon	Finalize motion to approve settlement with LTC - The Falcon, LLC.	0.30	145.50
Current Legal Fees:			1.20	\$ 582.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Katherine Nixon	485.00	1.20	582.00
Total		1.20	\$ 582.00

Invoice Totals

Total for Current Legal Fees:	\$ 582.00
Total For Current Invoice:	\$ 582.00

Fredrikson

Invoice: 1907738
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.5007

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through January 31, 2025

Regarding: Claims Administration and Objections

Total for Current Legal Fees: \$ 190.50

Total For Current Invoice: \$ 190.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:

[REDACTED]

Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

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Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1907738
Invoice Date: February 5, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
01/06/25	1901813	84.00		84.00
Total Prior Balance:				\$ 84.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of February 5, 2025. If payment has been sent close to this date, please verify payment status.

Fredrikson

Invoice: 1907738
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.5007

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/24/25	S. Kinsella	Communications with claimants regarding claims buyer.	0.30	190.50
Current Legal Fees:			0.30	\$ 190.50

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	0.30	190.50
Total		0.30	\$ 190.50

Invoice Totals

Total for Current Legal Fees: \$ 190.50

Total For Current Invoice: \$ 190.50

Fredrikson

Invoice: 1907739
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.5010

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through January 31, 2025

Regarding: Employment and Fee Applications

Total for Current Legal Fees:	\$ 2,698.00
Total For Current Invoice:	\$ 2,698.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:

[REDACTED]

Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

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Invoice: 1907739
Invoice Date: February 5, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
01/06/25	1901814	1,430.50		1,430.50
Total Prior Balance:				\$ 1,430.50

To avoid duplicate payments, the Prior Balance reflects what was still due as of February 5, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1907739
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.5010

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/15/25	K. Nixon	Draft Fredrikson's fifth fee application and Lighthouse's fifth staffing report and Q4 quarterly report.	1.70	824.50
01/15/25	S. Kinsella	Review and revise fee application (.2); review order approving fees (.1).	0.30	190.50
01/16/25	K. Nixon	Finalize Fredrikson's fifth fee application.	0.10	48.50
01/16/25	S. Kinsella	Meeting with special litigation counsel.	0.70	444.50
01/16/25	K. Nixon	Email CRO re: approval of November 2024 staffing report.	0.10	48.50
01/16/25	S. Stallings	Attention to finalizing fee application and exhibits and e-filing.	0.50	117.50
01/21/25	S. Kinsella	Review and revise application to employ special counsel.	0.20	127.00
01/21/25	S. Stallings	Prepare application to employ Fremstad Law as special counsel and email to counsel regarding same.	0.80	188.00
01/24/25	K. Nixon	Attention to inquiry re: unpaid invoices.	0.30	145.50
01/28/25	K. Nixon	Email CRO re: granting of Stinson's fourth fee application.	0.10	48.50
01/29/25	S. Kinsella	Communications with conflicts counsel regarding application to employ.	0.10	63.50
01/30/25	S. Kinsella	Review, revise, and finalize employment application.	0.60	381.00
01/30/25	S. Stallings	Attention to finalizing application to employ Fremstad; emails to S. Kinsella and Fremstad regarding same and status.	0.30	70.50
Current Legal Fees:			5.80	\$ 2,698.00



Invoice: 1907739
Invoice Date: February 5, 2025
Page: 2

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	1.90	1,206.50
Katherine Nixon	485.00	2.30	1,115.50
Shataia Stallings	235.00	1.60	376.00
Total		5.80	\$ 2,698.00

Invoice Totals

Total for Current Legal Fees:	\$ 2,698.00
Total For Current Invoice:	\$ 2,698.00

Fredrikson

Invoice: 1907740
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.5013

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through January 31, 2025

Regarding: Meetings and Communications with Creditors

Total for Current Legal Fees: \$ 5,724.50

Total For Current Invoice: \$ 5,724.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:



Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

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Please remit this page with your payment. Thank you. We appreciate your business.

Fredrikson

Invoice: 1907740
Invoice Date: February 5, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
11/04/24	1888543	57.50		57.50
01/06/25	1901816	356.00		356.00
Total Prior Balance:				\$ 413.50

To avoid duplicate payments, the Prior Balance reflects what was still due as of February 5, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1907740
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.5013

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/03/25	S. Kinsella	Communications with creditor.	0.10	63.50
01/09/25	S. Kinsella	Prepare for and participate in meeting with Committee counsel regarding status of negotiations and adversary proceedings.	1.30	825.50
01/13/25	S. Kinsella	Communications with Committee counsel regarding meeting and creditor communication.	0.20	127.00
01/14/25	S. Kinsella	Communications with Committee counsel regarding meeting with Committee and prepare for the same.	0.20	127.00
01/21/25	K. Nixon	Attention to preparation for meeting with committee.	0.20	97.00
01/22/25	S. Kinsella	Meeting with Committee.	0.80	508.00
01/22/25	K. Nixon	Meet with official committee of unsecured creditors and follow up phone call with CRO re: the same.	1.70	824.50
01/23/25	S. Kinsella	Communications with Committee and creditor regarding reports.	0.20	127.00
01/24/25	S. Kinsella	Prepare for and participate in meeting with counsel for Committee (1.0); communications with creditor (.3).	1.30	825.50
01/24/25	K. Nixon	Meet with counsel for the committee and strategize re: certain issues including notice and plan filing.	1.00	485.00
01/27/25	S. Kinsella	Communications with creditor (.1); prepare status update for Committee (.6).	0.70	444.50
01/28/25	S. Kinsella	Prepare list and status update regarding pending negotiations for Committee Counsel.	0.60	381.00
01/29/25	S. Kinsella	Finalize and send update regarding negotiations to Committee counsel (.7); communications with creditor (.1).	0.80	508.00

Fredrikson

Invoice: 1907740
Invoice Date: February 5, 2025
Page: 2

01/30/25	S. Kinsella	Communications with Committee regarding settlement proposals.	0.50	317.50
01/31/25	S. Kinsella	Communications with Committee counsel regarding settlement proposals.	0.10	63.50
Current Legal Fees:			9.70	\$ 5,724.50

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	6.80	4,318.00
Katherine Nixon	485.00	2.90	1,406.50
Total		9.70	\$ 5,724.50

Invoice Totals

Total for Current Legal Fees:	\$ 5,724.50
Total For Current Invoice:	\$ 5,724.50

Fredrikson

Invoice: 1907741
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.5015

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through January 31, 2025

Regarding: Plan and Disclosure Statement

Total for Current Legal Fees:	\$ 6,666.50
Total For Current Invoice:	\$ 6,666.50

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:

[REDACTED]

Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

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Invoice: 1907741
 Invoice Date: February 5, 2025
 Client Number: 097807
 Matter Number: 097807.5015

EPIC Companies Midwest, LLC
 Attn: Patrick Finn
 900 Long Lake Rd, Suite 180
 Lighthouse Management Group, Inc.
 New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/07/25	S. Kinsella	Continue to draft plan.	1.40	889.00
01/08/25	S. Kinsella	Continue to draft plan.	0.10	63.50
01/09/25	S. Kinsella	Continue to draft plan.	0.30	190.50
01/10/25	S. Kinsella	Draft plan.	0.10	63.50
01/13/25	S. Kinsella	Draft plan.	1.20	762.00
01/13/25	K. Nixon	Draft motion for substantive consolidation.	0.80	388.00
01/14/25	S. Kinsella	Continue to draft plan.	2.60	1,651.00
01/15/25	S. Kinsella	Draft plan.	0.20	127.00
01/23/25	K. Nixon	Draft motion for substantive consolidation.	0.70	339.50
01/27/25	S. Kinsella	Review and revise substantive consolidation motion.	0.40	254.00
01/27/25	K. Nixon	Revise motion for substantive consolidation and send to CRO for further input/review.	0.20	97.00
01/29/25	S. Kinsella	Draft plan.	1.60	1,016.00
01/30/25	S. Kinsella	Continue to draft plan.	1.30	825.50
Current Legal Fees:			10.90	\$ 6,666.50

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	9.20	5,842.00
Katherine Nixon	485.00	1.70	824.50
Total		10.90	\$ 6,666.50



Invoice: 1907741
Invoice Date: February 5, 2025
Page: 2

Invoice Totals

Total for Current Legal Fees:	\$ 6,666.50
Total For Current Invoice:	\$ 6,666.50

Fredrikson

Invoice: 1907742
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.5018

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through January 31, 2025

Regarding: Reporting

Total for Current Legal Fees:	\$ 358.50
Total For Current Invoice:	\$ 358.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:



Bank (Swift):

HATRUS44

Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

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Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1907742
Invoice Date: February 5, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
09/05/24	1876154	7,565.50	(3,001.50)	4,564.00
01/06/25	1901817	372.50		372.50
Total Prior Balance:				\$ 4,936.50

To avoid duplicate payments, the Prior Balance reflects what was still due as of February 5, 2025. If payment has been sent close to this date, please verify payment status.

Fredrikson

Invoice: 1907742
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.5018

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/20/25	K. Nixon	Email CRO re: monthly staffing report, quarterly report, and December MOR.	0.10	48.50
01/21/25	S. Stallings	Finalize & email monthly operating report for the Debtors and forward bank records to UST.	0.70	164.50
01/21/25	K. Nixon	Review and assist in finalizing December 2024 MORs and staffing/quarterly reports.	0.30	145.50
Current Legal Fees:			1.10	\$ 358.50

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Katherine Nixon	485.00	0.40	194.00
Shataia Stallings	235.00	0.70	164.50
Total		1.10	\$ 358.50

Invoice Totals

Total for Current Legal Fees:	\$ 358.50
Total For Current Invoice:	\$ 358.50

Fredrikson

Invoice: 1907743
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.0003

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through January 31, 2025

Regarding: Adversary action against Preference 42, LLC

Total for Current Legal Fees: \$ 194.00

Total For Current Invoice: \$ 194.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:

[REDACTED]

Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

**** Please note that Fredrikson & Byron will be adjusting its standard hourly billing rate schedule and some service charges rendered after January 1, 2025. If you have questions about the billing rates of specific individuals, please contact your billing attorney.****

Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1907743
Invoice Date: February 5, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
01/06/25	1901800	42.00		42.00
Total Prior Balance:				\$ 42.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of February 5, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1907743
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.0003

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/15/25	K. Nixon	Attend and participate in scheduling conference.	0.20	97.00
01/29/25	K. Nixon	Draft statement re: jury trial demand.	0.10	48.50
01/31/25	K. Nixon	Review scheduling order and email CRO re: the same.	0.10	48.50
Current Legal Fees:			0.40	\$ 194.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Katherine Nixon	485.00	0.40	194.00
Total		0.40	\$ 194.00

Invoice Totals

Total for Current Legal Fees:	\$ 194.00
Total For Current Invoice:	\$ 194.00

Fredrikson

Invoice: 1907744
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.0004

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through January 31, 2025

Regarding: Adversary against Boulevard Square

Total for Current Legal Fees:	\$ 2,842.00
Total For Current Costs and Other Charges:	\$ 20.00
Total For Current Invoice:	\$ 2,862.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:

Bank:	BMO Bank N.A.
Bank Address:	320 South Canal Street Chicago, IL 60606
ABA Routing No.:	071000288
Beneficiary:	Fredrikson & Byron P.A.
Account No:	0027619625
Bank (Swift):	HATRUS44
Please send remittance information to paynotification@fredlaw.com	

Tax ID: 41-0971937

**** Please note that Fredrikson & Byron will be adjusting its standard hourly billing rate schedule and some service charges rendered after January 1, 2025. If you have questions about the billing rates of specific individuals, please contact your billing attorney.****

Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1907744
Invoice Date: February 5, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
01/06/25	1901801	871.00		871.00
Total Prior Balance:				\$ 871.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of February 5, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1907744
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.0004

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/10/25	S. Kinsella	Analyze settlement proposal.	0.10	63.50
01/10/25	A. Griffin	Draft and edit letters to the clerk of court and affidavit accompanying foreign judgment.	1.50	480.00
01/10/25	K. Nixon	Review order granting motion for default judgments and email A. Griffin re: domestication of judgments.	0.20	97.00
01/14/25	K. Nixon	Email A. Griffin re: garnishments.	0.10	48.50
01/15/25	K. Nixon	Attend and participate in scheduling conference (0.3); email CRO re: schedule (0.1).	0.60	291.00
01/17/25	K. Nixon	Emails with A. Griffin re: banking information.	0.20	97.00
01/17/25	A. Griffin	Research ND law and process regarding garnishment of wages.	0.50	160.00
01/23/25	K. Nixon	Research jury trial issue.	0.90	436.50
01/23/25	S. Kinsella	Analyze settlement proposal.	0.20	127.00
01/23/25	A. Griffin	Review, edit, and finalize letter and affidavit with foreign judgments attached for clerk of court to file.	1.00	320.00
01/28/25	A. Griffin	Update letter to court, affidavit of foreign judgment, and draft affidavits of identification for each party for judgments against Boulevard II; E-file documents with the Court.	0.50	160.00
01/29/25	K. Nixon	Draft statement re: jury trial demand.	0.10	48.50
01/29/25	A. Griffin	Update letter to court, affidavit of foreign judgment, and draft affidavits of identification for each party in Boulevard IV matter; E-file documents with the Court.	0.60	192.00



Invoice: 1907744
 Invoice Date: February 5, 2025
 Page: 2

01/29/25	A. Griffin	Call clerk of court to determine preference between filing hard copy and e-filing; Update letter to court, affidavit of foreign judgment, and draft affidavits of identification for each party for judgments against Boulevard IV; E-file documents with the Court.	0.70	224.00
01/31/25	K. Nixon	Attention to Clerk's notice of returned mail.	0.20	97.00
Current Legal Fees:			7.40	\$ 2,842.00

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	0.30	190.50
Katherine Nixon	485.00	2.30	1,115.50
Abigale R. Griffin	320.00	4.80	1,536.00
Total		7.40	\$ 2,842.00

Costs and Other Charges

	<u>Amount</u>
01/23/25 Filing fee Ward County Clerk of District Court (315 3rd St SE, P.O. Box 5005 Minot ND 58702) - 1.23.2025 - Foreign Judgment Fee	10.00
01/23/25 Filing fee Cass County Clerk of District Court - 1.23.2025 24-0723 - Foreign Judgment Fee	10.00
Current Costs and Other Charges:	\$ 20.00

Invoice Totals

Total for Current Legal Fees:	\$ 2,842.00
Total For Current Costs and Other Charges:	\$ 20.00
Total For Current Invoice:	\$ 2,862.00

Fredrikson

Invoice: 1907745
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.0005

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through January 31, 2025

Regarding: Adversary against Pioneer Place, LLC

Total for Current Legal Fees:	\$ 1,056.50
Total For Current Costs and Other Charges:	\$ 10.00
Total For Current Invoice:	\$ 1,066.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:

[REDACTED]

Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

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Invoice: 1907745
Invoice Date: February 5, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
01/06/25	1901802	1,096.50		1,096.50
Total Prior Balance:				\$ 1,096.50

To avoid duplicate payments, the Prior Balance reflects what was still due as of February 5, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1907745
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.0005

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/06/25	A. Griffin	Review Foreign Judgment Statute; Draft Affidavit of Identification and letter to clerk of court.	1.20	384.00
01/06/25	K. Nixon	Emails to M. Raum and A. Griffin re: domestication of judgment.	0.20	97.00
01/06/25	S. Kinsella	Provide instruction regarding domestication of judgment.	0.10	63.50
01/14/25	A. Griffin	Review, edit, and finalize documents to file to record foreign judgment.	0.30	96.00
01/17/25	A. Griffin	Research ND law and process regarding garnishment of wages; Begin preparing notice of intent to garnish.	0.80	256.00
01/28/25	A. Griffin	Update letter to court, affidavit of foreign judgment, and draft affidavits of identification for each party; E-file documents with the Court.	0.50	160.00
Current Legal Fees:			3.10	\$ 1,056.50

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	0.10	63.50
Katherine Nixon	485.00	0.20	97.00
Abigale R. Griffin	320.00	2.80	896.00
Total		3.10	\$ 1,056.50



Invoice:
Invoice Date:
Page:

1907745
February 5, 2025
2

Costs and Other Charges

	<u>Amount</u>
01/14/25 Filing fee Cass County Clerk of District Court - 00000 - Foreign Judgment Fee	10.00

Current Costs and Other Charges: **\$ 10.00**

Invoice Totals

Total for Current Legal Fees: \$ 1,056.50

Total For Current Costs and Other Charges: \$ 10.00

Total For Current Invoice: **\$ 1,066.50**



Invoice: 1907746
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.0006

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through January 31, 2025

Regarding: Adversary against SAD Downtown, LLC d/b/a The Firm

Total for Current Legal Fees:	\$ 257.50
Total For Current Invoice:	\$ 257.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:



Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

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Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1907746
Invoice Date: February 5, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
01/06/25	1901803	214.50		214.50
Total Prior Balance:				\$ 214.50

To avoid duplicate payments, the Prior Balance reflects what was still due as of February 5, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1907746
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.0006

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/15/25	K. Nixon	Attend and participate in scheduling conference.	0.20	97.00
01/29/25	K. Nixon	Draft statement re: jury trial demand.	0.20	97.00
01/29/25	S. Kinsella	Review jury request response.	0.10	63.50
Current Legal Fees:			0.50	\$ 257.50

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	0.10	63.50
Katherine Nixon	485.00	0.40	194.00
Total		0.50	\$ 257.50

Invoice Totals

Total for Current Legal Fees: \$ 257.50

Total For Current Invoice: \$ 257.50

Fredrikson

Invoice: 1907747
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.0007

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through January 31, 2025

Regarding: Adversary against Greenfield Commons

Total for Current Legal Fees: \$ 1,333.50

Total For Current Invoice: \$ 1,333.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:

[REDACTED]

Please send remittance information to paynotification@fredlaw.com

Tax ID: 41-0971937

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Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1907747
Invoice Date: February 5, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
01/06/25	1901804	126.00		126.00
Total Prior Balance:				\$ 126.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of February 5, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1907747
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.0007

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/16/25	S. Kinsella	Review settlement proposal.	0.20	127.00
01/17/25	S. Kinsella	Analyze settlement proposals.	0.60	381.00
01/30/25	S. Kinsella	Review settlement counter proposals.	0.80	508.00
01/31/25	S. Kinsella	Prepare and send settlement counteroffers.	0.50	317.50
Current Legal Fees:			2.10	\$ 1,333.50

Timekeeper Summary

<u>Timekeeper</u>	<u>Bill Rate</u>	<u>Hours</u>	<u>Billed Amount</u>
Steven R. Kinsella	635.00	2.10	1,333.50
Total		2.10	\$ 1,333.50

Invoice Totals

Total for Current Legal Fees:	\$ 1,333.50
Total For Current Invoice:	\$ 1,333.50

Fredrikson

Invoice: 1907748
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.0008

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through January 31, 2025

Regarding: Adversary against EPIC Holdings II

Total for Current Legal Fees: \$ 97.00

Total For Current Invoice: \$ 97.00

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:

[REDACTED]

Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

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Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1907748
Invoice Date: February 5, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
01/06/25	1901805	126.00		126.00
Total Prior Balance:				\$ 126.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of February 5, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1907748
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.0008

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/22/25	K. Nixon	Email CRO re: filed answer.	0.10	48.50
01/31/25	K. Nixon	Review scheduling order and email CRO re: the same.	0.10	48.50
Current Legal Fees:			0.20	\$ 97.00

Invoice Totals

Total for Current Legal Fees:	\$ 97.00
Total For Current Invoice:	\$ 97.00

Fredrikson

Invoice: 1907749
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.0009

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through January 31, 2025

Regarding: Adversary against U of J MU Jamestown, LLC

Total for Current Legal Fees: \$ 959.50

Total For Current Invoice: \$ 959.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:

[REDACTED]

Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

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Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1907749
Invoice Date: February 5, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
01/06/25	1901806	356.00		356.00
Total Prior Balance:				\$ 356.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of February 5, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1907749
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.0009

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/06/25	S. Kinsella	Draft settlement agreement.	0.50	317.50
01/17/25	K. Nixon	Draft motion for default judgment.	0.40	194.00
01/17/25	S. Kinsella	Communications with client regarding answer deadline.	0.20	127.00
01/20/25	S. Kinsella	Revise settlement agreement.	0.10	63.50
01/21/25	S. Kinsella	Revise settlement agreement.	0.10	63.50
01/21/25	K. Nixon	Revise settlement agreement for client review and execution.	0.40	194.00
Current Legal Fees:			1.70	\$ 959.50

Invoice Totals

Total for Current Legal Fees: \$ 959.50

Total For Current Invoice: \$ 959.50

Fredrikson

Invoice: 1907750
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.0010

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through January 31, 2025

Regarding: Adversary against LTC – The Don, LLC

Total for Current Legal Fees: \$ 160.50

Total For Current Invoice: \$ 160.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:

[REDACTED]

Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

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Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1907750
Invoice Date: February 5, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
01/06/25	1901807	147.00		147.00
Total Prior Balance:				\$ 147.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of February 5, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1907750
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.0010

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/07/25	K. Nixon	Review response to complaint and send copy of the same to CRO.	0.10	48.50
01/29/25	K. Nixon	Draft statement re: jury trial demand.	0.10	48.50
01/31/25	S. Kinsella	Review order for status conference on jury issue.	0.10	63.50
Current Legal Fees:			0.30	\$ 160.50

Invoice Totals

Total for Current Legal Fees: \$ 160.50

Total For Current Invoice: \$ 160.50

Fredrikson

Invoice: 1907751
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.0011

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through January 31, 2025

Regarding: Adversary against 36th and Veterans, LLC

Total for Current Legal Fees: \$ 929.50

Total For Current Invoice: \$ 929.50

NOTE: Our records indicate that you have a prior balance due. Please refer to the next page of this invoice for details.

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:

[REDACTED]

Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

**** Please note that Fredrikson & Byron will be adjusting its standard hourly billing rate schedule and some service charges rendered after January 1, 2025. If you have questions about the billing rates of specific individuals, please contact your billing attorney.****

Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1907751
Invoice Date: February 5, 2025
Page:

Prior Balance Due Detail

<u>Date</u>	<u>Invoice Number</u>	<u>Amount</u>	<u>Payments</u>	<u>Balance Due</u>
01/06/25	1901808	147.00		147.00
Total Prior Balance:				\$ 147.00

To avoid duplicate payments, the Prior Balance reflects what was still due as of February 5, 2025. If payment has been sent close to this date, please verify payment status.



Invoice: 1907751
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.0011

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/17/25	K. Nixon	Draft motion for default judgment.	0.40	194.00
01/21/25	K. Nixon	Finalize motion for default judgment for filing.	0.20	97.00
01/22/25	K. Nixon	Finalize motion for default judgment for filing.	0.30	145.50
01/23/25	K. Nixon	Submit proposed order to Court administration.	0.10	48.50
01/27/25	S. Kinsella	Phone call with counsel for defendant (.3); follow up phone call with CRO regarding the same (.3).	0.60	381.00
01/29/25	S. Kinsella	Communications with defense counsel regarding potential settlement.	0.10	63.50
Current Legal Fees:			1.70	\$ 929.50

Invoice Totals

Total for Current Legal Fees: \$ 929.50

Total For Current Invoice: \$ 929.50

Fredrikson

Invoice: 1907752
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.0013

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through January 31, 2025

Regarding: Adversary against Pioneer Place Holdings, LLC

Total for Current Legal Fees: \$ 515.00

Total For Current Invoice: \$ 515.00

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:

[REDACTED]

Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

***** Please note that Fredrikson & Byron will be adjusting its standard hourly billing rate schedule and some service charges rendered after January 1, 2025. If you have questions about the billing rates of specific individuals, please contact your billing attorney.*****

Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1907752
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.0013

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/09/25	K. Nixon	Draft motion for default judgment.	0.80	388.00
01/09/25	S. Kinsella	Review motion for default judgment.	0.10	63.50
01/10/25	S. Kinsella	Analyze settlement proposal.	0.10	63.50
Current Legal Fees:			1.00	\$ 515.00

Invoice Totals

Total for Current Legal Fees: \$ 515.00

Total For Current Invoice: \$ 515.00

Fredrikson

Invoice: 1907753
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.0016

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through January 31, 2025

Regarding: Adversary against HI West Acres, LLC, f/k/a EPIC Hospitality, LLC

Total for Current Legal Fees: \$ 242.50

Total For Current Invoice: \$ 242.50

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:

[REDACTED]

Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

***** Please note that Fredrikson & Byron will be adjusting its standard hourly billing rate schedule and some service charges rendered after January 1, 2025. If you have questions about the billing rates of specific individuals, please contact your billing attorney.*****

Please remit this page with your payment. Thank you. We appreciate your business.



Invoice: 1907753
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.0016

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/15/25	K. Nixon	Phone call with and email to G. Singer re: requested information.	0.20	97.00
01/15/25	K. Nixon	Email client re: filing of answer.	0.10	48.50
01/17/25	K. Nixon	Review scheduling order and email CRO re: the same.	0.10	48.50
01/29/25	K. Nixon	Draft statement re: jury trial demand.	0.10	48.50
Current Legal Fees:			0.50	\$ 242.50

Invoice Totals

Total for Current Legal Fees: \$ 242.50

Total For Current Invoice: \$ 242.50

Fredrikson

Invoice: 1907754
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.0017

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

For Previously Unbilled Professional Services Rendered Through January 31, 2025

Regarding: Adversary against LTC – The Falcon, LLC

Total for Current Legal Fees: \$ 381.00

Total For Current Invoice: \$ 381.00

Payment is due within 30 days from receipt of invoice

If you have any questions please email accounting@fredlaw.com or contact a client representative at 612.492.7574.

Remittance Address:

Fredrikson & Byron P.A.
P.O. Box 1484
Minneapolis, MN 55480-1484

Online Payments:

[Fredlaw.com/payment](https://fredlaw.com/payment)

Wire Instructions:

[REDACTED]

Please send remittance information to paynotification@fredlaw.com

Tax ID: [REDACTED]

***** Please note that Fredrikson & Byron will be adjusting its standard hourly billing rate schedule and some service charges rendered after January 1, 2025. If you have questions about the billing rates of specific individuals, please contact your billing attorney.*****

Please remit this page with your payment. Thank you. We appreciate your business.

Fredrikson

Invoice: 1907754
Invoice Date: February 5, 2025
Client Number: 097807
Matter Number: 097807.0017

EPIC Companies Midwest, LLC
Attn: Patrick Finn
900 Long Lake Rd, Suite 180
Lighthouse Management Group, Inc.
New Brighton, MN 55112

Legal Fees

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/17/25	S. Kinsella	Revise settlement agreement and send to borrower.	0.30	190.50
01/21/25	S. Kinsella	Finalize settlement agreement.	0.30	190.50
Current Legal Fees:			0.60	\$ 381.00

Invoice Totals

Total for Current Legal Fees: \$ 381.00

Total For Current Invoice: \$ 381.00

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NORTH DAKOTA**

In re:

Jointly Administered

EPIC Companies Midwest, LLC,
EPIC Companies Midwest 2023, LLC,
EPIC Employee, LLC,
EOLA Capital, LLC, and
EC West Fargo, LLC,

Bankruptcy No. 24-30281
Bankruptcy No. 24-30282
Bankruptcy No. 24-30283
Bankruptcy No. 24-30284
Bankruptcy No. 24-30285

Debtors.

Chapter 11

**NOTICE OF SIXTH APPLICATION OF FREDRIKSON & BYRON, P.A. FOR
ALLOWANCE OF FEES AND EXPENSES AS CHAPTER 11 COUNSEL FOR THE
DEBTORS FROM JANUARY 1, 2025 THROUGH JANUARY 31, 2025**

TO: The parties-in-interest as specified in the Notice and Service Requirements adopted pursuant to Local Rule 2002-1 and the Court's order limiting notice pursuant to Fed. R. Bankr. P. 2002(i). (ECF No. 124.)

1. **NOTICE IS HEREBY GIVEN** that Fredrikson & Byron, P.A., as Chapter 11 counsel for the Debtors, has filed its sixth application for allowance of fees and expenses, a copy of which is attached hereto and served upon you.

2. **NOTICE IS FURTHER GIVEN** that any objection to the application must be filed with the Clerk of the United States Bankruptcy Court, whose address is Quentin N. Burdick Courthouse, 655 First Avenue North, Suite 210, Fargo, North Dakota 58102, and served upon the attorney whose name and address is listed below, by **Friday, March 7, 2025, which is twenty-one (21) days from the date of the filing of this Notice**. Any objections not filed and served may be deemed waived.

Dated: February 14, 2025

/e/ Steven R. Kinsella

Michael S. Raum (#05676)

FREDRIKSON & BYRON, P.A.

51 Broadway, Suite 400

Fargo, ND 58102-4991

701.237.8200

mraum@fredlaw.com

Steven R. Kinsella (#09514)

Katherine A. Nixon (*pro hac vice* MN #0402772)

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ATTORNEYS FOR DEBTORS